

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

AMERICAN SPIRIT AND CHEER
ESSENTIALS, INC., ROCKSTAR
CHAMPIONSHIPS, LLC, JEFF & CRAIG
CHEER, LLC, d/b/a JEFF AND CRAIG
CAMPS, and ASHLEY HAYGOOD,
Individually and on Behalf of all Others
Similarly Situated,

Plaintiffs,

v.

VARSITY BRANDS, LLC, BSN SPORTS,
LLC, VARSITY SPIRIT, LLC, STANBURY,
LLC, HERFF JONES, LLC, BAIN CAPITAL,
LP, CHARLESBANK CAPITAL
PARTNERS, LLC, VARSITY BRANDS
HOLDING CO., INC., VARSITY SPIRIT
FASHION & SUPPLIES, LLC, U.S. ALL
STAR FEDERATION, INC., USA
FEDERATION FOR SPORT CHEERING,
d/b/a USA CHEER, VARSITY INTROPIA
TOURS, LLC and JEFF WEBB,

Defendants.

CIVIL ACTION

FILE NUMBER:

2:20-cv-02782-SHL-atc

**MOTION TO APPOINT INTERIM
LEAD CLASS COUNSEL**

MOTION

Pursuant to Fed. R. Civ. P. 23(g)(3), Plaintiffs move to select Robert A. Falanga to act as Interim Lead Class Counsel for the putative classes identified in Plaintiffs' Complaint.

Respectfully submitted,

This 3rd day of November, 2020.

s/ Robert A. Falanga

Attorney Bar Number: 254400

Attorney for Plaintiffs and their Putative
Classes

Motion for admission pro hac vice forthcoming

s/ Kobelah Svensen Bennah

Attorney Bar Number: 378113

Attorney for Plaintiffs and their Putative
Classes

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